

# Directors Guild of America, Inc.

DGA Letter to Federal Communications Commission RE: MB Docket No. 10-36

p. 2



June 21, 2010

**NATIONAL OFFICE**  
• 7920 SUNSET BLVD.  
• 110 WEST 57TH STREET  
• 400 N. MICHIGAN AVE., SUITE 307

• LOS ANGELES, CA 90046  
• NEW YORK, NY 10019  
• CHICAGO, IL 60611  
• 310-289-2000  
• 212-581-0370  
• 312-644-5050  
• FAX 310-289-2029  
• FAX 212-581-1441  
• FAX 312-644-5776

## OFFICERS

### PRESIDENT

TAYLOR HACKFORD

### NATIONAL VICE PRESIDENT

STEVEN SODERBERGH

### SECRETARY-TREASURER

GILBERT CATES

### ASSISTANT SECRETARY-TREASURER

SCOTT BERGER

### VICE PRESIDENTS

PARIS BARCLAY  
WILLIAM M. BRADY  
BETTY THOMAS  
GARY DONATELLI  
THOMAS SCHLAMME  
VINCENT MISIANO

### NATIONAL EXECUTIVE DIRECTOR

JAY D. ROTH

## BOARD MEMBERS

HERB ADELMAN  
MICHAEL APTED  
STEPHEN GLANZROCK  
LESLI LINKA GLATTER  
VICTORIA HOCHBERG  
CLEVE LANDSBERG  
MICHAEL MANN  
DONALD PETRIE  
SCOTT L. RINDENOW  
ED SHERIN  
JESÚS TREVIÑO

## ASSOCIATES

DUNCAN HENDERSON  
DENNIS W. MAZZOCCO  
BARBARA ROCHE  
LIZ RYAN  
MARY RAE THEWLIS

## ALTERNATES

LAURA BELSEY  
LEE BLAINE  
LEVAR BURTON  
ALAN B. CURTISS  
JULIE GELFAND  
JOAN GRIFFIN  
STEPHEN GYLLENHAAL  
ROD HOLCOMB  
TODD HOLLAND  
JEREMY KAGAN  
RANDAL KLEISER  
GARRY MARSHALL  
KATHLEEN MCGILL  
ELENA SANTABALLA  
MAX A. SCHINDLER  
MILICENT SHELTON  
EAMES YATES  
MICHAEL ZINBERG

### ASSOCIATE NATIONAL EXECUTIVE DIRECTOR

WARREN ADLER

### WESTERN EXECUTIVE DIRECTOR

G. BRYAN UNGER

### EASTERN EXECUTIVE DIRECTOR

RUSSELL HOLLANDER

### MIDWESTERN EXECUTIVE DIRECTOR

DANIEL J. MOORE

### GENERAL COUNSEL

DAVID KORDUNER

## VIA ELECTRONIC FILING

June 21, 2010

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

RE: MB Docket No. 10-56

Dear Ms. Dortch:

On behalf of the Directors Guild of America, I write to express our views on the proposed joint venture agreement between Comcast and GE regarding NBC Universal.

As the proposed Comcast acquisition of NBC Universal from GE moves through the regulatory process, many important issues must be raised and carefully examined. However, many parties have criticized the proposed merger without considering key areas of concern for this industry that we believe may be positively impacted by the transaction.

Specifically, too little focus has been placed on the issue of jobs maintenance and creation. In a time when the industry is facing financial pressures from all sides, we expect that Comcast's commitment to grow the industry, infuse new capital into the entertainment business and invest additional resources into programming will represent a change from the uncertainty caused by many of the current owner's past decisions concerning commitment to our industry, programming and jobs.

Comcast has committed to support of independent programming, including adding new independently-owned and -operated channels. This will increase access to a range of viewpoints and provide new job opportunities, as well as provide additional distribution opportunities for independent projects on an established platform.

Comcast has also stated that it will maintain local and national news programming and invest new resources in news programming, with NBC's owned and operated stations collectively producing an additional 1,000 hours per year of local news and information programming which will provide additional jobs for our members.

Finally, Comcast has pledged to honor NBC Universal's existing collective bargaining agreements, providing an important assurance that the mature agreements the DGA has negotiated with NBC Universal over decades will remain strong and in place.

As we noted, there are many issues that should and will be raised during the regulatory process. We hope that the potential for jobs maintenance and creation is given strong consideration while the federal regulatory agencies are making their decision.

Thank you for the opportunity to share our views with you.

Sincerely,

/s/ Jay D. Roth

Jay D. Roth  
National Executive Director  
Directors Guild of America

CC: Chairman Julius Genachowski  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Attwell Baker